

# **EXHIBIT A**

## **Justin White v. Vance County Sheriff et. al.** **Comparisons of Counts in Complaint and Proposed Amended Complaint**

<b><u>COMPLAINT</u></b>	<b><u>PROPOSED AMENDED COMPLAINT</u></b>	
<b><u>Count I</u></b> Violation of 42 U.S.C. § 1983 Disparate Treatment Under 42 U.S.C. § 1981 (Against All Defendants)	<b><u>Count I</u></b> Violation of 42 U.S.C. § 1983 Disparate Treatment Under 42 U.S.C. § 1981 (Against All Defendants)	No change
<b><u>Count II</u></b> Violation of 42 U.S.C. § 1983 Hostile Work Environment Under 42 U.S.C. § 1981 (Against All Defendants)	<b><u>Count II</u></b> Violation of 42 U.S.C. § 1983 Hostile Work Environment Under 42 U.S.C. § 1981 (Against All Defendants)	No change
<b><u>Count III</u></b> Violation of 42 U.S.C. § 1983 Unlawful Retaliation Under 42 U.S.C. § 1981 (Against All Defendants)	<b><u>Count III</u></b> Violation of 42 U.S.C. § 1983 Unlawful Retaliation Under 42 U.S.C. § 1981 (Against All Defendants)	No change
<b><u>Count IV</u></b> Violation of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e <i>et seq.</i> Govt. Employees Rights Act of 1991, 42 U.S.C. § 2000e-16a <i>et seq</i> Disparate Treatment (Against All Defendants)	<b><u>Count IV</u></b> Violation of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e <i>et seq.</i> Govt. Employees Rights Act of 1991, 42 U.S.C. § 2000e-16a <i>et seq</i> Disparate Treatment (Against All Defendants)	No change
<b><u>Count V</u></b> Violation of Title VII of Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e <i>et seq.</i> Govt. Employees Rights Act of 1991, 42 U.S.C. § 2000e-16a <i>et seq</i>	<b><u>Count V</u></b> Violation of Title VII of Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e <i>et seq.</i> Govt. Employees Rights Act of 1991, 42 U.S.C. § 2000e-16a <i>et seq</i>	No change

Hostile Work Environment (Against All Defendants)	Hostile Work Environment (Against All Defendants)	
<b><u>Count VI</u></b> Violation of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e <i>et</i> <i>seq.</i> Govt. Employees Rights Act of 1991, 42 U.S.C. § 2000e- 16a <i>et seq</i> Retaliation (Against All Defendants)	<b><u>Count VI</u></b> Violation of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e <i>et</i> <i>seq.</i> Govt. Employees Rights Act of 1991, 42 U.S.C. § 2000e- 16a <i>et seq</i> Retaliation (Against All Defendants)	No change
<b><u>Count VII</u></b> Breach of Contract (Against the County and VCSO Defendants)	<b><u>Count VII</u></b> Breach of Contract (Against the County and VCSO Defendants and Sheriff White)	No change  (except now alleged against former sheriff White too)
<b><u>Count VIII</u></b> Tortious Interference with Employment and Related Opportunities (Individual Defendants)	<b><u>Count VIII</u></b> Tortious Interference with Employment and Related Opportunities (Against Individual Defendants)	No change
<b><u>Count IX</u></b> Negligent Retention and Negligent Supervision (Against Individual Defendants Sheriff White and Chief Deputy Bullock)	<b><u>Count IX</u></b> Tortious Interference with Prospective Economic Advantage (Against Individual Defendants)	<b><u>NEW CLAIM</u></b>
<b><u>Count X</u></b> Ratification (Against Individual Defendants Sheriff White and Chief Deputy Bullock)	<b><u>Count X</u></b> Intentional Infliction of Emotional Distress (Against Individual Defendants)	<b><u>NEW CLAIM</u></b>
<b><u>Count XI</u></b> Punitive Damages (All Defendants)	<b><u>Count XI</u></b> Negligent Infliction of Emotional Distress	<b><u>NEW CLAIM</u></b>

	(Against Individual Defendants)	
	<b><u>Count XII</u></b> Wrongful Discharge under the Equal Employment Practices Act N.C. Gen. Stat. § 143-422.2 (Against Individual Defendants Sheriff White and Chief Deputy Bullock)	<b><u>NEW CLAIM</u></b>
	<b><u>Count XIII</u></b> Negligent Retention and Negligent Supervision (Against Individual Defendants Sheriff White and Chief Deputy Bullock)	No change  (but re-numbered from Count IX in Complaint)
	<b><u>Count XIV</u></b> Ratification (Against Individual Defendants Sheriff White and Chief Deputy Bullock)	No change  (but re-numbered from Count X in Complaint)
	<b><u>Count XV</u></b> Defamation/Libel (Against All Defendants)	<b><u>NEW CLAIM</u></b>
	<b><u>Count XVI</u></b> Punitive Damages (All Defendants)	No change  (but re-numbered from Count XI in Complaint)